

			<u>Hours</u>
11/1/2016	RJJS	work on proposed order with Mr. Zubatov per Judge's instructions; communications with Mr. Ellner; pursue forensics services	1.20
	AZ	revision and e-filing of letter and proposed order regarding e-mails; coordination with Mr. Scarola and paralegal staff regarding same; e-mail exchange with Mr. Scarola regarding same; review of filing regarding same from Mr. Jones	2.00
11/2/2016	RJJS	work on order follow-up with Mr. Zubatov per Judge's instructions; communications with Mr. Ellner; pursue forensics services;	1.60
	AZ	review of court's order regarding forensic computer expert; e-mail exchange with Mr. Scarola regarding same; review of e-mail exchange between Mr. Scarola and Mr. Jones regarding same	0.50
11/3/2016	RJJS	follow-up on forensics expert	0.20
11/4/2016	RJJS	extensive work on arranging forensic investigations	3.40
11/7/2016	RJJS	work on arranging forensic investigations	0.60
11/8/2016	RJJS	further work on arranging forensic investigations	0.80
11/9/2016	RJJS	confer with forensics groups regarding work to be done	0.40
11/9/2016	AZ	review of e-mail exchange between Mr. Scarola, Mr. Ellner, Mr. Jones and Nashville IT firm regarding outstanding issues; review of documents to prepare search terms; review of e-mail from Mr. Scarola forwarding terms of engagement and protocol with Nashville firm and review of same	5.00
11/10/2016	RJJS	work with forensics group regarding protocol due November 14	2.00

Page 2

			<u>Hours</u>
	AZ	continued review of documents to ascertain search terms to be used; e-mail exchange with Mr. Scarola and Mr. Ellner regarding same; review of Protocols used in prior forensics investigations to draft same; drafting same; e-mail exchange with Mr. Scarola regarding same; drafting e-mail to e-discovery firm regarding protocol and regarding search terms to be used; review of response and further response to same; e-mail to Mr. Jones regarding protocol	11.60
11/11/2016	AZ	completion of search terms based on forensic expert's guidelines; e-mail exchanges with Mr. Scarola and Mr. Jones regarding same; e-mail exchanges with forensic expert regarding same and regarding timing of process; e-mail exchange with Mr. Jones regarding privilege searches and his other concerns with protocol; e-mail exchange with forensic expert and Mr. Scarola regarding devices to be searched and protocol to be followed; revision of protocol and e-mail to Mr. Jones regarding same	5.10
	RJJS	work with forensics group regarding protocol due November 14; correspondence with AE	0.50
11/14/2016	RJJS	work on Order to be submitted to the Court; extensive communications with AZ	1.50
	AZ	coordination with Mr. Scarola, Mr. Jones and Discovia to finalize search terms and forensic investigation protocol and accompanying proposed order and to e-file same; call with Discovia to address protocol; conference with Mr. Scarola regarding same	10.70
11/15/2016	RJJS	further work on forensics collection	0.20
11/16/2016	AZ	review of order entered by judge regarding forensic examination; e-mail exchange with Mr. Scarola regarding same; conference with Mr. Ellner regarding same; e-mail to Mr. Jones regarding same; e-mail exchange with forensic expert regarding same	1.30
11/17/2016	RJJS	address ongoing forensics logistics issues	0.50
	AZ	communication with Mr. Scarola, Mr. Jones and Discovia regarding logistics of data collection	1.50
11/18/2016	RJJS	further work on forensics issues; conferences with AZ regarding forensics issues	0.60
	AZ	continued communication with Mr. Jones, Mr. Scarola and Discovia regarding logistics of data collection	1.70
11/20/2016	AZ	e-mail exchange with Mr. Jones and Discovia regarding confirmation of time and contact info for forensic examination	0.50

			Page 3
			<u>Hours</u>
11/21/2016	RJJS	address forensics issues	0.10
	AZ	e-mail exchange with Discovia and Mr. Scarola regarding parameters of data transfer	0.20
11/22/2016	RJJS	work on forensics issues; conferences with AZ	0.10
	AZ	conference call with Discovia regarding status of forensic inquiry; e-mail exchange with Mr. Scarola regarding same	1.60
11/23/2016	AZ	e-mail to Ms. Wolfram/Discovia regarding cost of proceeding	0.10
11/27/2016	RJJS	communications with forensics group	0.20
11/28/2016	RJJS	communications with forensics group; address pricing disconnect; analyze Zacks production in that regard	0.70
11/29/2016	RJJS	correspondence from and with forensics group; extensive follow-up	0.90
11/30/2016	RJJS	address forensics issues	0.10

			<u>Hours</u>
12/1/2016	RJJS	address forensics issues with AZ	0.10
	AZ	review of Discovia's revised proposal; conference with Mr. Ellner regarding same; review of forensic discovery protocol; e-mail to Mr. Scarola regarding same; conference with Mr. Scarola regarding same; e-mail exchange with vendor regarding same	1.70
12/5/2016	RJJS	correspondence regarding forensics group prices changes	0.10
	AZ	review of e-mail from Discovia regarding results of searches on database; e-mail exchanges with them and with Mr. Scarola regarding details of same; e-mail exchanges with Discovia and Mr. Scarola regarding details of uploading and cost of investigation	4.50
12/6/2016	RJJS	negotiate with forensics group further	0.20
12/7/2016	RJJS	negotiate with forensics group further	0.20
	AZ	review of e-mails between Mr. Scarola and Discovia regarding project costs; e-mail exchanges with Discovia regarding setup of database; conferences with Ms. Pitock and Ms. Ohayon regarding same; e-mail exchange with Mr. Jones regarding same	2.00
12/8/2016	RJJS	extensive conferences regarding forensics effort and next related communications to the Court regarding those issues	0.50
	AZ	conference with Ms. Ohayon and Ms. Pitock regarding Relativity training; attendance at Relativity training; e-mail to Mr. Scarola regarding updating court and procedure for document review of Relativity database; conference with Mr. Scarola regarding same; beginning of preliminary review of database; conference with Mr. Scarola regarding same; conference with Mr. Scarola regarding	7.60

Page 2

Hours

same; attempt to search for e-mails uniquely responsive to Zacks-Shealy term; e-mail exchanges with Discovia regarding same; e-mail exchanges with Mr. Scarola regarding same; conference with Ms. Ohayon regarding same			
	EO	attendance at the Relativity training	1.30
12/9/2016	RJJS	research for sanctions motion; work with team regarding forensics review; letter to Judge Cote; correspondence from Mr. Jones regarding forensics issues	0.60
	AZ	conference with Ms. Ohayon regarding review of documents to find Zacks documents in database; drafting letter to judge regarding status of investigation; e-mail exchange with Mr. Scarola to revise same; coordination with Ms. Ohayon to e-file same; review of Mr. Jones response to same; review of Mr. Scarola's e-mails regarding sanctions for discovery non-compliance	3.20
	EO	conference with Mr. Zubatov regarding review of documents to find Zacks documents in database; review of same	1.80
12/12/2016	RJJS	correspondence with forensics groups; related work with AZ	0.40
	EO	review of documents to find Zacks documents in database	4.60
	AZ	review of e-mail from Ms. Ohayon regarding status of Zacks e-mails in database; e-mail exchange with Mr. Scarola regarding manner of proceeding to review rest of documents; review of Relativity database in light of same	2.40
12/13/2016	RJJS	work on issues regarding forensics review; work on demand correspondence to Mr. Jones regarding recent disclosure failings	0.80
	AZ	e-mail exchanges with Mr. Scarola, Ms. Ohayon and Discovia to arrive at plan for review of documents by Mr. Ellner and to set up database for same; coordination with Ms. Ohayon to print documents for Mr. Ellner's review	2.90
12/14/2016	RJJS	review Jones privilege log; work on the issues regarding forensics review permitted by AE and to be implemented by him	0.60
	AZ	coordination with Ms. Ohayon and Mr. Scarola to produce documents for Mr. Ellner's review; e-mail exchange with Mr. Scarola regarding follow-up searches and review of search results in light of same; e-mail exchange with Ms. Ohayon and Mr. Scarola regarding documents generated in response to searches; refining searches in light of same; review of Mr. Jones' privilege log and e-mail to Mr. Scarola regarding same	3.80
12/15/2016	RJJS	review Jones privilege log; work on the issues regarding forensics review permitted by AE and to be implemented by him; work on search limitations to assess additional documents withheld by 3HL	1.50

			Page 3
			<u>Hours</u>
12/15/2016	AZ	beginning of research regarding discovery malfeasance sanctions	4.10
12/16/2016	RJJS	review Jones privilege log issues with AZ; work on the forensics review	0.40
	AZ	e-mail exchanges with Mr. Scarola and Ms. Ohayon regarding additional searches to be done in Relativity database; continued research regarding discovery sanctions; conference with Mr. Scarola regarding privilege log	1.50
12/19/2016	RJJS	review forensics review with AE and assess sanctions options/availability with AZ; discuss next steps with AZ for forensics review	0.40
	AZ	e-mail exchange with Mr. Ellner regarding privileged documents; e-mail exchange with Mr. Jones regarding same; continued research regarding discovery sanctions; conference with Mr. Scarola regarding same and regarding other issues in case	5.40
12/20/2016	RJJS	work on the forensics review; assess document print and review status; and arrangement for AE to continue it online	0.20
	AZ	completion of sanctions research and e-mail memo to Mr. Scarola regarding same; coordination with Ms. Ohayon and Discovia to set up Discovia training for Mr. Ellner	1.60
12/21/2016	AZ	conference with Mr. Ellner regarding Luxury Services; e-mail exchange and conference with Ms. Ohayon regarding same; additional conference with Mr. Ellner regarding same	1.20
12/22/2016	AZ	conference with AZ regarding plan for his review of documents	0.20
12/29/2016	AZ	conference with Mr. Ellner regarding received CD-ROM of documents and regarding his flagged documents; e-mail exchange with Mr. Scarola regarding these issues	0.50
	RJJS	communications with AZ	0.10
12/30/2016	AZ	review of documents flagged by Mr. Ellner; e-mail to Mr. Scarola regarding same; e-mail exchange with Mr. Scarola regarding same	1.50